



Arthur J. Bauernfeind College of Business

Department of Economics and Finance

MURRAY STATE UNIVERSITY

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October 18, 2018

Mr. W. Gary Blackburn
Attorney at Law and
Mr. Bryant Kroll
Attorney at Law
The Blackburn Firm, PLLC
213 Fifth Avenue North, Suite 300
Nashville, TN 37219

RE: Comprehensive Security, Inc., Associated Protective Service, Inc., and OnTrac Security, LLC, Plaintiffs, v. Metropolitan Government of Nashville and Davidson County, Defendant
In the United States District Court for the Middle District of Tennessee at Nashville

Dear Mr. Blackburn and Mr. Kroll:

At your request I have reviewed the "Verified Complaint for Declaratory and Injunctive Relief" for Comprehensive Security, Inc., et al. v. Metropolitan Government of Nashville and Davidson County, dated April 16, 2018; Data Identifying the Precincts and Number of Post Commission Officers in Davidson and Adjacent Counties and other sources cited throughout this report to answer two basic economic questions with respect to the alleged actions of the Metro Nashville Police Department ("MNPd") in the provision of security services for special events held in the Metro Area. (1) Is it anti-competitive if a market participant limits the available labor pool needed by rivals to produce a product or provide a service? and (2) Is selling a product or providing a service at a loss in the short run to drive competitors out of the market to earn future higher prices and profits a form of predatory pricing? Following is a summary of my analysis of and conclusion to these questions.

Based on information provided, private security companies including Comprehensive Security, Inc. ("CSI"), Associated Protective Service, Inc., ("APS") and OnTrac Security, LLC ("OnTrac") provided security services for special events held in the Metro Area such as the Oktoberfest, German Festival, The Italian
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Lights Festival, Steeplechase and the Nashville Sounds Baseball games and hired both Metro Nashville Police Department (“MNPDP”) and non-MNPDP Post Certified officers to provide these services. Recently the Metro Nashville Police Department (“MNPDP”) began a practice and procedure of taking over the provision of security services for the major events held in Davidson County. Their alleged actions include, *inter-alia*: forbidding MNPDP officers to work for private security firms and decreasing the pool of available qualified officers; requesting wage and fee information from private firms and providing the services at a reduced price believed, in some cases, to be below cost or free of charges; and informing event coordinators that they must use MNPDP officers to handle traffic control and security for special events held in the Metropolitan area. (“Verified Complaint for Declaratory and Injunctive Relief” – *Comprehensive Security, Inc. et al. v. Metropolitan Government of Nashville and Davidson County*, April 16, 2018).

In addressing the questions: (Is it anti-competitive if a market participant limits the available labor pool needed by rivals to produce a product or provide a service? and Is operating a firm at a loss in producing a good or providing a service a form of predatory pricing?) we take a brief look at market structure which refers to the competitive relationship existing among firms in an industry. At one end of the spectrum is pure competition which includes a large number of firms, none of which influence market price, a standardized or homogenous product and easy entry and exit of the market. Purely competitive firms are price takers and do not earn long run profits. Pure competition exists primarily in the markets for some agricultural commodities. At the other end of the spectrum is monopoly which consists of one firm in the industry with considerable control over price, produces a unique product or provides a unique service with no close substitutes and has barriers, legal and/or economic, to entering the market. Examples of pure monopolies are regulated utilities providing electrical or similar services. Next to monopoly is oligopoly which consists of a small number of large firms, each of which influence the market. Oligopolies may provide standardized products or services. Oligopolies may practice non price competition through product differentiation or advertising or may engage in collusive pricing with rivals. Although not monopolies, oligopoly firms may have considerable market power depending on the concentration of the industry. Oligopolies exist in industries with large firms such as autos, steel and oil but also may be found in industries with a small number of smaller firms such as highway construction firms and those owning rock quarries.

Prior to the alleged recent actions by MNPDP to forbid MNPDP officers to provide off duty security services to private security firms and informing prospective event coordinators that they must use MNPDP officers to handle traffic control and security for special events held in Davidson County they, more likely than not, operated in a somewhat competitive market. The degree of market power

that a given firm has depends on the number of firms in the industry but more importantly on the size of the firm relative to other firms in the industry. To get a better picture of market structure and concentration within a given market, economists often use a measure called the Herfindahl-Hirschman Index, or HHI. The HHI for an industry is the sum of the squared market shares of each firm in the industry. By squaring the market shares, much greater weight is given to larger firms than smaller ones. For example, an industry with four firms, each of which have 25 percent of the market would have an HHI of $2500 = (25^2 + 25^2 + 25^2 + 25^2)$. In a purely competitive firm where each firm has a small percent of the market the HHI would approach zero and in a pure monopoly industry the HHI would be $10,000 = (100^2)$. The Herfindahl-Hirschman Index is used by the U.S. Justice Department and the Federal Trade Commission, which have the task of enforcing antitrust policy. According to the U.S. Justice Department guidelines, an HHI below, 1,500 indicates a strongly competitive market, between 1,500 and 2,500 indicates a somewhat competitive market and over 2,500 indicates an oligopoly. In an industry with an HHI over 1,500, a merger that results in a significant increase in the HHI would receive special scrutiny and is likely to be disallowed. According to the U.S. Department of Justice Merger Guidelines of 1982, "non-concentrated markets are defined as those with an HHI of less than 1,000 (McConnell, Campbell R. and Stanley L. Brue, Economics, Twelfth Edition, McGraw-Hill, Inc., 1993; Krugman, Paul and Robin Wells, Economics, Fourth Edition, Worth Publishers, 2015; Keat, Paul G. and Philip Y. Young, Managerial Economics, Fourth Edition, Prentice Hall, 2003).

The other side of the market which may give firms monopoly power is the "buy side" or purchase of factors of production needed to produce the product or provide the service. Firms may limit competition by owning or controlling strategic resources necessary to produce a product or provide a service. For example, the DeBeers diamond syndicate effectively controlled about 80 to 90 percent of the world's diamond supply which gave them considerable market power in pricing diamonds. Also in 1878 Standard Oil controlled almost all U.S. Oil refining until it was broken up in 1911. According to information obtained from the POST Commission there are 3,615 Post Commissioned Officers in Davidson and the six adjacent counties which are considered the reasonable pool of officers available for part time employment by private firms providing security services in Davidson County. The distribution by county is: Davidson, 1,488, (78 of which are other than MNPD); Robertson, 172; Sumner, 455; Wilson, 318; Rutherford, 619; Williamson, 456; and Cheatham, 107. The distribution in terms of market share of the pool of Post Commissioned Officers expressed as a percentage of the total is: MNPD, 39; Davidson (other), 2; Robertson, 5; Sumner, 12; Wilson, 9; Rutherford, 17; Williamson, 13; and Cheatham, 3. Applying the Herfindahl & Hirschman Index as a measure of market concentration $HHI = (39^2 + 2^2 + 5^2 + 12^2 + 9^2 + 17^2 + 13^2 + 3^2) = 2,242$. As indicated earlier an HHI of 1,500 to

2,500 indicates a somewhat competitive market and over 2,500 indicates an oligopoly. Also with 39 percent of the available pool of Post Certified Officers MNPDP has considerable market power. Should the available Post Certified Officer pool be reduced to those supplied by MNPDP then the HHI would equal 10,000 (100^2) and the MNPDP would have a monopsony (monopoly on the “buy side”) position in the market for Post Certified Officers. It should also be noted that the HHI measures the market power that a firm may have in an industry based on market concentration but does not identify other impacts a firm’s action may have on its rivals. For example, if the MNPDP was effective in reducing the pool of available officers to private security firms it would make the rivals less competitive because the officers they could employ would have to travel further which would be more costly and time consuming and would make events providing employment for short time periods less attractive. Also, if private security firms servicing large events had to recruit officers from multiple locations it would require more time and would increase their operating cost thus further reducing competition in the market.

Data showing the market share of the MNPDP and private security firms that provided security services for special events held in the Metro Nashville Area was not available at the time this report was written. Therefore, it was not possible to measure market concentration on the “sell side” of the market based on the Herfindahl-Hirschman Index. However, in the absence of market data needed to calculate the HHI it is clear that if the MNPDP is successful in excluding all other security firms from the Metro Nashville market the HHI would equal 10,000 = (100^2) and the MNPDP would, defacto, have a monopoly position in the market.

In summary, if a firm reduces or limits the resources available and needed by rival firms in an industry, to produce a product or provide a service, it effectively makes the industry more concentrated, increases the market power of the dominant firm and reduces competition in the industry. If the Metro Nashville Police Department forbids MNPDP officers from working part time for private security firms it effectively reduces the pool of available workers to those firms by about thirty-nine percent and constitutes a partial barrier to entry for the private security firms resulting, *ceteris paribus*, in lesser competition in the market. From an economic point of view, the practice of pricing a good or service below the cost of production in the short run, to drive competitors out of business and to discourage new entrants into a market so that the firm can enjoy higher future prices and profits is considered predatory pricing. Offering a product or providing a service at zero cost would, more likely than not, be below the cost of production. Finally, if the MNPDP becomes the exclusive provider of security services in Davidson County it would have a monopoly position in the market.

According to my belief and knowledge, all statements and information in this report are true and accurate, subject to the underlying assumptions, and the conclusions are based on reasonable probability. I also certify that I have no interest, present or contemplated, in the above matter and that neither the employment nor compensation is contingent on the opinions expressed.

Thank you again for the opportunity to work with you on the case. Please contact me if there are any questions or if there are any additional aspects that should be explored.

Respectfully submitted,

A handwritten signature in cursive script that reads "Gilbert L. Mathis".

Gilbert L. Mathis, Ph.D.
Professor Emeritus of Economics

GLM/dn

SUMMARY OF BACKGROUND AND EXPERIENCE OF

GILBERT L. MATHIS

EDUCATION:

University of Kentucky, B.S., 1960
University of Kentucky, M.S., 1963
Ohio State University, Ph.D., 1966
University of Florida, Summer 1970
University of Texas, Summer 1974

EMPLOYMENT:

Professor Emeritus of Economics, Murray State University, 2004-
Professor of Economics, Murray State University, 1972-2004
Chair, Department of Economics and Finance, Murray State
University, 1987-1997
Associate Professor of Economics, Murray State University,
1969-72
Assistant Professor of Economics, Murray State University,
1966-69
Coordinator of Agriculture Programs, University of Kentucky
Community College, 1965-66
Research Assistant, Ohio State University, 1964-65
Agriculture Teacher, Anderson High School, 1960-64

RELATED PROFESSIONAL EXPERIENCE:

Consulting to Business Firms, Law Firms, Educational Institutions and Government Agencies

Regional Law Firms: Kentucky, Tennessee, Illinois, Florida,
Missouri, Mississippi, Louisiana, Connecticut, Pennsylvania,
Ohio, Colorado, Texas, Virginia, Maryland, Indiana, California,
Minnesota, Alabama, South Carolina and Washington, D.C.
Northeast Missouri State University, Kirksville, Missouri.
City of Fulton, Fulton, Kentucky.
The Tennessee-Tombigbee Waterway Authority, Columbus, Mississippi.
The Kentucky Development Cabinet, Frankfort, Kentucky.
Spike Elevator Incorporated, Fort Dodge, Iowa.
Murray State University, Murray, Kentucky.
Tennessee Valley Authority, Knoxville, Tennessee.
U.S. Department of Agriculture, Washington, D.C.
Communication Workers of America, Paducah, Kentucky.
Southern Illinois Sand Incorporated, Golconda, Illinois.
Florida Farm Bureau, Gainesville, Florida.
City of Hopkinsville, Hopkinsville, Kentucky.
U.S. Department of Energy, Washington, D.C.
Science Applications Incorporated, Oak Ridge, Tennessee
and La Jolla, California.
Legislative Correspondent, U.S. Senate for Walter D.
Huddleston, Washington, D.C., Summer 1982.
Adjunct Professor, Psychology Internship Training Consortium,
Vanderbilt University, Nashville, Tennessee, 1990-93.
Visiting Professor, United Institute of International Education,
Kowloon, Hong Kong, Spring 1997.

Consulting to Business Firms, Law Firms, Educational Institutions and
Government Agencies (Continued-)

U.S. Department of Justice, U.S. Attorney, Middle District of
Tennessee, Nashville, Tennessee, 2001-
Kansas City, Missouri School District, Kansas City, Missouri,
Spring 2002.
West Texas A&M University, Canyon, Texas, 2004.

PUBLICATIONS:

Research Project Reports

The Status of Economic Education in Kentucky High Schools
(Coauthor, Howard C. Giles, Murray State University), (17 pp.).
Benefits and Costs of Out-of-State Students Attending MSU
(49 pp.), October 1971.
Economic and Academic Impact of the Dormitory Scholarship
Program on Murray State University (46 pp.), March 1974.
An Economic Study of Western Kentucky Including an Estimate
of the Economic Impact of the Tennessee-Tombigbee Waterway
and the Development of an Investment Strategy for the
Purchase and Pennyrile Areas (189 pp.), October 1978.
The Economic Impact of Murray State University on Murray and
Calloway County (70 pp.), October 1979.
Views Held By Agriculturalists and Environmentalists on
Key Issues Related to Mayfield, Obion, and Bayou du Chien
Creeks in Western Kentucky (106 pp.), October 1982.
Potential Impact of the Inland Waterway Fuel Tax on the U.S.
Grain Industry (Coauthor, Philip R. Smith, Michigan State
University), (83 pp.), April 1983.
General Market Analysis for the City of Hopkinsville,
Kentucky (Coauthors, Roger C. Schoenfeldt and Phillip B.
Niffenegger), (139 pp.), 1984.
An Evaluation of Nonresident Fee Waiver Scholarships at Murray
State University (93 pp.), 1984.
The Economic Impact of Murray State University on West Kentucky
(114 pp.), 1986.
The Value of the Dollar and U.S. Grain Exports (Coauthor,
R. Andrew Batts, Murray State University), (26 pp.), 1988.
Enhancing Regional Value Added From Mississippi Delta Primary
Products (Coauthors, James P. McCoy, Martin I. Milkman and
James F. Thompson), (30 pp.), 1990.
The Economic Impact of LWD, Inc, (108 pp.), 1993.
Estimating Break Even Household Incomes and Budgets for Job
Related Local Government Expenditures, (27 pp.), 1999.
An Inquiry Into the Scope, Operation, Economics and Social
Desirability of Charity Bingo, (48 pp.), 2000.
An Assessment of the Retirement Eligibility of Selected Employees
of the Kansas City Missouri School District, (40 pp.), 2002.
The Economic Impact of Murray State University on Kentucky, West
Kentucky and Calloway County, (149 pp.), 2003.

Journal Articles

- "Farm Management Programs for Young Farmers," Agricultural Education Magazine, 1967.
- "What About a Negative Income Tax?" Business Dynamics, 1969.
- "Do Out-of-State Students Pay Their Way?" College Management, 1973.
- "The Integration of the Legal-Economic Process in 20th Century America," Western Business and Economics Journal, 1979.
- "The Economic Impact of Murray State University on Murray and Calloway County," The Kentucky Journal of Economics and Business, 1980-81.
- "Barge Transportation and the Demand for Railroad Services," Southwestern Economics Association Journal of Abstracts, 1981.
- "Grain Elevator Bankruptcy Statutes: Problems and Legislative Proposals" (Coauthor, Thomas W. Little, Washington, D.C.), Southwestern Economics Association Journal of Abstracts, 1982.
- "Views Held by Agriculturalists and Environmentalists on Key Issues Related to Mayfield, Obion, and Bayou du Chien Creeks in Western Kentucky," The Kentucky Journal of Economics and Business, 1984.
- "Waterway User Taxes, Grain Exports and Intraindustry Equity" (Coauthor, Philip R. Smith, Michigan State University), Southwestern Journal of Economic Abstracts, 1984.
- "A Synthesis of Alfred Marshall's Contribution to Economic Thought," Essays in Economic and Business History, 1984.
- "Potential Impact of the Inland Waterway Fuel Tax on the U.S. Grain Industry" (Coauthor, Philip R. Smith, Michigan State University), National Waterways Foundation, 1984.
- "Airline Deregulation: Who Pays and Who Benefits," Essays in Economic and Business History, 1985.
- "The Tennessee Tombigbee Waterway: An Alternative Route for Coal Shippers," Proceedings of the Illinois Mining Institute, Springfield, Illinois, 93 Year 1985.
- "An Evaluation of Nonresident Fee Waiver Scholarships at Murray State University," The Kentucky Journal of Economics and Business, 1985-86.
- "Adjusted and Discounted Earnings Projections for Selected Income Levels" (18 tables), The National Directory of Vocational Experts, 1986-87, Nashville, Tennessee.
- "The U.S. Economy and the Kondratieff Syndrome" (Coauthor, Philip R. Smith, Michigan State University), The Kentucky Journal of Economics and Business, 1987.
- "Primary Products and Value Added In the Mississippi Delta Region" (Coauthors, James P. McCoy, Martin I. Milkman and James F. Thompson), Social Science Perspectives Journal, 1991.
- "Alternative Methods of Appraising the Destruction of Earning Power," Journal of Legal Economics, 1991.
- "Firm Location Decisions and Downstream Processors of Delta Agricultural Products" (Coauthors, James P. McCoy, Martin I. Milkman and James F. Thompson), Murray State University, Delta Business Review, 1992.
- "The Calculation and Application of Age-Earnings Adjustments," (Coauthor, Michael L. Brookshire, West Virginia University), The Journal of Legal Economics, 1994.

Journal Articles (Continued-)

- "Transforming Global Economic Relations: Changing Roles and Rules"
(Coauthor, Philip R. Smith, Michigan State University), Essays In Economic and Business History, 1996.
- "A Note on Estimating Lost Earnings from Partial Permanent Injury: Three Approaches for the Trier of Fact" (Coauthor, C. Michael Lawson, Attorney at Law, Nashville, Tennessee), Journal of Legal Economics, Vol. 8, Number 3, Winter 1998-99.
- "An Inquiry into the Scope, Operation, Economics and Social Responsibility of Charity Bingo," Journal of Business and Public Affairs, 2001.
- "Tobacco In Transition: An Overview of Sixty-Six Years of Partnership Between Producers, Processors and Politicians" (Coauthor, William M. Snell, University of Kentucky), Essays in Economic and Business History, 2007.
- "Assessing Economic Damages in Personal Injury and Wrongful Death Litigation: The State of Colorado" (Coauthor, Jane Lillydahl, University of Colorado), Journal of Forensic Economics, Volume XXIV, September 2013.

PROFESSIONAL PRESENTATIONS:

- "The Economic Impact of the Tennessee-Tombigbee Waterway on Western Kentucky," Kentucky Economic Association, Louisville, Kentucky, 1979.
- "The Economic Impact of Murray State University on Murray and Calloway County," Kentucky Economic Association, Lexington, Kentucky, 1980.
- "Barge Transportation and the Demand for Railroad Services," Southwestern Economics Association, Dallas, Texas, 1981.
- "An Analysis of Price and Wage Controls in the United States Since 1900," Economic and Business Historical Society, Portland, Oregon, 1981.
- "An Analysis of Cost Recovery User Fees on Commercial Carriers Using Inland Waterways" (Coauthor, Philip R. Smith, Michigan State University), Southwestern Economic Association, San Antonio, Texas, 1982.
- "A Synthesis of Alfred Marshall's Contribution to Economic Thought," Economics and Business Historical Society, St. Paul, Minnesota, 1982.
- "Grain Elevator Bankruptcy Statutes: Problems and Legislative Proposals" (Coauthor, Thomas W. Little, U.S. Senate), Southwestern Economic Association, Houston, Texas, 1983.
- "Waterway User Taxes and the U.S. Grain Export Industry" (Coauthor, Philip R. Smith, Michigan State University), Midwest Economics Association, Chicago, Illinois, 1984.
- "Waterway User Taxes, Grain Exports and Intraindustry Equity" (Coauthor, Philip R. Smith, Michigan State University), Southwestern Economics Association, Fort Worth, Texas, 1984.
- "Airline Deregulation: Who Pays and Who Benefits," Economics and Business Historical Society, Salt lake City, Utah, 1984.
- "Converting Agency Funds to General Revenue Funds," Joint Committee on Agriculture and Natural Resources, Frankfort, Kentucky, 1984.

PROFESSIONAL PRESENTATIONS: (Continued-)

- "An Evaluation of Commodity Options as a Strategy for Participants in the Grain Market" (Coauthor, Philip R. Smith, Michigan State University), Southwestern Economics Association Annual Convention, Houston, Texas, 1985.
- "The Tennessee Tombigbee Waterway: An Alternative for Coal Shippers," Ninety-Third Annual Meeting, Illinois Mining Institute, Springfield, Illinois, 1985.
- "Economics and Tort Law," West Kentucky Bar Association, Murray, Kentucky, 1985.
- "Trade Restrictions and U.S. Agricultural Exports" (Coauthor, Philip R. Smith, Michigan State University), Southwestern Economics Association, San Antonio, Texas, 1986.
- "The 'Ghost' of Smoot-Hawley: Past, Present and Future" (Coauthor, Philip R. Smith, Michigan State University), Economic and Business Historical Society, Atlanta, Georgia, 1986.
- "The U.S. Economy and the Kondratieff Syndrome" (Coauthor, Philip R. Smith, Michigan State University), Southwestern Economic Association, Dallas, Texas, March 1987.
- "World Trade and the GATT: Forty-Year Profile" (Coauthor, Philip R. Smith, Michigan State University), Economic and Business Historical Society, San Francisco, California, 1987.
- "The Value of the Dollar and U.S. Grain Exports" (Coauthor, R. Andrew Batts, Murray State University), Midwest Economic Association, Chicago, Illinois, 1988.
- "From Dump and Burn to PIK and Roll: An Analysis of Farm Policy 1933-1987" (Coauthor, Philip R. Smith, Michigan State University), Economic and Business Historical Society, Toronto, Ontario, 1988.
- "The Economist as Expert Witness In Appraising Earning Capacity," Kentucky Economic Association, Lexington, Kentucky, 1988.
- "Alternative Methods of Appraising the Destruction of Earning Power," American Academy of Economic and Financial Experts, Las Vegas, Nevada, 1989.
- "Personal Consumption Considerations In Determining Losses Resulting From Wrongful Death" (Coauthor, Philip R. Smith, Michigan State University), Western Economic Association International, Seattle, Washington, 1991.
- "Challenges and Opportunities for a North American Free Trade Agreement" (Coauthor, Philip R. Smith, Michigan State University), Economic and Business Historical Society, Seattle, Washington, April 1992.
- "Determining Optimal Wage Adjustments In Calculating Lost Earnings" (Coauthor, Philip R. Smith, Michigan State University), Western Economic Association International, San Francisco, California, July 1992.
- "Estimating Lost Earnings From Permanent Partial Injury: Three Approaches For the Trier of Fact" (Coauthor, C. Michael Lawson --Eason, Lawson, Fishburn & Dalton, Nashville, Tennessee), Western Economic Association International, San Francisco, California, July 1992.
- "The Calculation and Application of Age-Earnings Adjustments" (Coauthor, Michael L. Brookshire, University of West Virginia), Southern Economics Association, Washington, D.C., November 1992.

PROFESSIONAL PRESENTATIONS: (Continued-)

- "Transforming Global Economic Relations: Changing Roles and Rules" (Coauthor, Philip R. Smith, Michigan State University), Economic and Business Historical Society, Boulder, Colorado, April 1995.
- "Personal Consumption Deductions In Estimating Economic Losses" (Coauthors, Frank H. Julian, Murray State University and Philip R. Smith, Michigan State University), Western Economic Association International, San Diego, California, July 1995.
- "The Appropriate Investments For Efficient Mitigation of Economic Loss" (Coauthor, William F. Landsea, University of Miami, Miami, Florida). American Academy of Economic and Financial Experts, Las Vegas, Nevada, March, 1999.
- "A Simplified Approach to Determining Appropriate Deductions for Basic Maintenance Expenditures in Wrongful Death Actions," American Academy of Economic and Financial Experts, Las Vegas, Nevada, March 2001.
- "The Economic Impact of Murray State University on Kentucky, West Kentucky and Calloway County," Kentucky Economic Association, Lexington, Kentucky, 2004.
- "Tobacco in Transition: An Overview of Sixty-Six Years of Partnership Between Producers, Processors and Politicians" (Coauthor, William M. Snell, University of Kentucky, Lexington, Kentucky, Economic and Business Historical Society, Pittsburgh, PA, 2006.
- "Social Security - Solvent or Bankrupt? In Need of Reconstruction or Retirement?" Economic and Business Historical Society, Providence, Rhode Island, April 2007.
- "Assessing Economic Damages in Personal Injury and Wrongful Death Litigation: The State of Colorado (Coauthor, Jane Lillydahl, University of Colorado), Southern Economic Association, New Orleans, Louisiana, November, 2012.

PROFESSIONAL AFFILIATIONS:

American Academy of Economic and Financial Experts
National Association of Forensic Economists
Collegium of Pecuniary Economic Damages
Economics and Business Historical Society-Past President
Kentucky Economic Association-Past President
Southern Economic Association
Midwest Economics Association
American Board of Master Educators-Professional Advisory Council
American Board of Disability Analysts
Jackson Purchase Historical Society-Past President

HONORS AND AWARDS:

Alpha Zeta (Honorary Fraternity), 1959.
Gamma Sigma Delta (Honor Society), 1960.
Omicron Delta Epsilon
Honors Day, University of Kentucky, 1960 (upper 3% of class).
Outstanding Educator In America Award, 1972.
Master Conservationist Award (Christian County), 1977.
Invited participant, White House Briefing on Ratification of Panama Canal Treaties, 1977.
Invited Participant, White House on Domestic Economic Policy, 1978.
Outstanding Paper Recognition Award, College of Business and Public Affairs, Murray State University, 1979, 1984, 1985, 1992.
Speakers Bureau-Kentucky Humanities Council, 1993-95.
Economic and Business Historical Society-Editor's Award, 2007.

EXHIBIT:
NUMBERS OF P.O.S.T. COMMISSION
CERTIFIED POLICE OFFICERS BY COUNTY
AND MUNICIPALITY

COUNTY	ENTITIES	# of POST COMMISSIONED OFFICERS
DAVIDSON COUNTY	MNPD	1410
DAVIDSON COUNTY (Other than MNPD)	Belle Meade PD	15
	Goodlettsville PD	44
	Ridgetop PD	6
	Berry Hill PD	13
	TOTAL	78
ROBERTSON COUNTY	Coopertown PD	6
	Cross Plains PD	5
	Greenbriar PD	14
	Ridgetop PD	6
	Robertson County Sheriff's Department	75
	Springfield PD	39
	White House PD.	27
	TOTAL	172
SUMNER COUNTY	Sumner County Sheriff's Office	182
	Gallatin PD.	85
	Westmoreland PD	11
	Hendersonville PD	121
	Millersville PD	16
	Portland PD	31
	Volunteer State Community College	9
	TOTAL	455
WILSON COUNTY	Wilson County Sheriff's Office	155
	Lebanon PD	100
	Mount Juliet PD	58
	Watertown PD	5
	TOTAL	318
RUTHERFORD COUNTY	Rutherford County Sheriff's Office	230

	Murfreesboro PD	247
	La Vergne PD	60
	Smyrna PD	82
	TOTAL	619
WILLIAMSON COUNTY	Williamson County	226
	Sheriff's Office	
	Brentwood PD	64
	Fairview PD	21
	Franklin PD	130
	Nolensville PD	15
	TOTAL	456
CHEATHAM COUNTY	Cheatham County	79
	Sheriff's Office	
	Pleasant View PD	6
	Ashland City PD	16
	Kingston Springs PD	6
	TOTAL	107
TOTAL COMMISSIONED OFFICERS		2205
OTHER THAN MNPd		

SCHEDULE OF FEES

ECONOMIC CONSULTING

GILBERT L. MATHIS

Economic research, analysis, reporting and deposition/trial preparation	\$200/hr.
Testimony at depositions and trials - 2 hour minimum	\$200/hr.
Travel Time	\$30/hr.
Expenses (no charge except for overnight and/or commercial travel)	
Statements will be sent upon submission of reports or data and after depositions and/or trials	

1-1-2016

CASES IN WHICH TESTIMONY WAS GIVEN THROUGH DEPOSITION

Gilbert L. Mathis

2009

Don Drake and Sandra Drake, Individually, and as Next Friends of Lee Eric Drake, Deceased, Plaintiffs, v. Jana M. Williams, M.D. and Centennial Medical Center/Parthenon Pavilion, Defendants

Wrongful Death -- Plaintiff

Kelly, Kelly & Allman, Hendersonville TN

First Circuit for Davidson County TN

February 2009

Harris N. Jacobs, et al., v. Steven A. Michell, M.D., et al.

Wrongful Death--Plaintiff

Ashworth & Associates, Nashville TN

Third Circuit Court of Davidson County TN

February 2009

Richard P. Alexander, Jr., Personal Representative of the Estate of June C. Alexander, Deceased, and as Parent and Guardian of RCA, a minor, and Regina Phillips, Individually, Plaintiffs, vs. Hamlinco, Inc., a Tennessee Corporation, d/b/a Rockin Raceway; Charles S. Martin, Individually; Antonio Zamperla, s.p.a.; and Zemperla Inc.; Defendants.

Wrongful Death, Plaintiff

Nimmo, Hoehn & Nimmo, Nashville TN

Circuit Court for Sevier County TN

March 2009

Bridgie McClain, Individually, and as Representative for the Estate of Christopher Wayne McClain, et al., vs. Dinesh Shah, M.D.

Wrongful Death, Plaintiff

Tod D. Megibow, Paducah KY

Graves Circuit Court

March 2009

Jacqueline S. Goldsby vs. Pain Clinic Associates, P.C. and Kit S. Mayes, M.D.

Personal Injury – Plaintiff

Apperson, Crump & Maxwell, PLC, Memphis TN

Shelby County Circuit Court

April 2009

Kennard R. Morris, et al., v. Woodrow R. Wilson, M.D., et al.

Wrongful Death – Plaintiff

Kelly, Kelly & Allman, Hendersonville TN

Williamson County Circuit Court

April 2009

Jamie Watson Ledbetter, Individually and as the Surviving Spouse of Decedent, Barry Kevin Ledbetter, vs. Daniel W. Carmody, M.D.
Wrongful Death – Plaintiff
Bednarz & Bednarz, Nashville TN
Circuit Court Robertson County TN
June 2009

Estate of Wanda Bell, by and through its Administrator, Walter Bell and Walter Bell, Individually and The Northern Group vs. Tayyab Malik, M.D. and Bowling Green–Warren County Community Hospital Corporation D/B/A, the Medical Center at Bowling Green
Wrongful Death – Plaintiff
Flora Templeton Stuart, Bowling Green KY
Warren Circuit Court
August 2009

Jennifer Darlene Bunch and husband, Robert Bunch, vs. Jeffery Landman, M.D. and Virtual Radiology, P.C.
Personal Injury – Plaintiff
Barry E. Weathers, Nashville TN
Davidson Circuit Court
September 2009

Oscar Turner, Jr. and Carol Turner d/b/a, Taylor Seed Company, Plaintiffs, vs. Branch Bank & Trust, Defendant
Loan Dispute – Plaintiff
Null, Samson & Paitsel, Mayfield KY
Commonwealth of Kentucky, Calloway Circuit Court
September 2009

Austin T. Wells, a Disabled Person, by and through his Conservator and Natural Mother, Carron C. Wells Baker, v. Donald Estes, Estes LLC and the State of Tennessee
Personal Injury – Plaintiff
Apperson, Crump & Maxwell, PLC, Memphis TN
Shelby Circuit Court
September 2009

Andrea Caddel and David Petch, Co-Administrators of the Estate of Deanna Petsch; Andrea Caddel; David Petch; and Mark H. Flener, Chapter 7 Trustee; Plaintiffs, v. City of Hopkinsville, Kentucky and Avalon Trailer Home Park, Inc. d/b/a, Western Hills Mobile Home Park, Defendants
Wrongful Death – Plaintiff
Burman Law, Hopkinsville KY
Christian Circuit Court Division II
September 2009

Kenny Stone v. Goodman Manufacturing Company, LP
Personal Injury – Plaintiff
Law Office of Donald D. Zuccarello, Nashville TN
Lincoln County Circuit Court
October 2009

Ann Disch, wife and next of kin of Robert Disch, deceased, v. Carl Hampf, M.D., et al.
Medical Malpractice – Plaintiff
Leader, Bulso & Nolan, PSC, Nashville TN
Circuit Court of Davidson County
October 2009

Marva Lynn Lunsford, as Administratrix Ad Litem of the Estate of Jomeka Lunsford,
Plaintiff, v. Ronald K. Gilmer, M.D., Ronald K. Gilmer, M.D., PC, Defendants
Medical Malpractice – Plaintiff
K. Cody Allison, Nashville TN
Davidson County Circuit Court
November 2009

Diane Downs, individually and as natural parent and next of kin of Ryan Cody Downs, vs.
Scott Hurdle and Jerry Dane Eller
Wrongful Death – Plaintiff
Charles P. Yezbak, III, Nashville TN
December 2009

Jerry Bisher vs. Continental General Tire Inc., et al.
Loss of Income – Plaintiff
Null, Samson & Paitzel, Mayfield KY
Graves Circuit Court
December 2009

2010

Rachel Jeanette Sumpter and Joel Andrew Sumpter, Plaintiffs, vs. W.D. and Mary Ann
Shytle and American Patriot Getaways, Defendants
Personal Injury – Plaintiff
Kelly, Kelly & Allman, Hendersonville TN
In the Circuit Court of Sevier County, Tennessee
February 2010

Vamsi Gutti, By and Through His Parent and Next Friend, Srinivasa Gutti, Plaintiff, v.
John C. Gurley, M.D., et al., Defendants
Personal Injury – Defendant
Philip M. Longmeyer, Densmore & Shohl, LLP, Louisville KY
Commonwealth of Kentucky, Fayette Circuit Court, Eighth Division
April 2010

Gerry R. Dickson vs. National Maintenance & Repair of Kentucky, Inc.
Personal Injury – Plaintiff
Godwin, Morris, Laurenzi & Bloomfield, P.C., Memphis TN; and
Brian S. Katz, Paducah KY
U.S. District Court, Western District of Kentucky at Paducah
June 2010

Mona Mathis and Niel Mathis, Plaintiffs, vs. Shirley M. Crass and Board of Education of
Graves County Kentucky
Wrongful Death – Plaintiff
Bryant Law Center, P.S.C., Paducah KY
Commonwealth of Kentucky, Graves Circuit Court
July 2010

Amber D. Wilson, et al., Plaintiffs, v. Stephen W. Dohoney; and Konecranes, Inc.,
Defendants
Wrongful Death – Plaintiff
Wm. Clint Prow, Providence KY 42450
United States District Court, Western District of Kentucky, Owensboro KY
August 2010

Arthur Cushman, M.D., v. HCA Health Services of Tennessee, Inc., d/b/a Skyline Medical
Center and Hospital Housekeeping Systems GP, LLC
Personal Injury – Plaintiff
Law Office of Donald D. Zuccarello, Nashville TN
In the Sixth Circuit Court for Davidson County, Tennessee
August 2010

James Michael Wooldridge v. Evansville Marine Service, Inc.
Personal Injury – Plaintiff
White & Flood, Houston TX
United States District Court, Western District of Kentucky, Owensboro Division
September 2010

Cynthia Green and Lee Ray Shannon Green, husband and wife, vs. Samella Spence,
Individually and as Administrator Ad Litem for Estate of Dolphus Louis Spence, Deceased,
Defendants
Personal Injury – Plaintiff
Lucius Hawes Law Firm, Hopkinsville KY
Davidson Circuit Court, Tennessee
September 2010

Beverly D. Cannon, Plaintiff, vs. Joseph May, Defendant
Personal Injury – Plaintiff
John M. Longmeyer, PSC, Louisville KY
Jefferson Circuit Court, Division II, Kentucky
October 2010

Brenda Jo Williams, Darwin Williams, Plaintiffs, v. Dana R. Tyrrell, Western Baptist Hospital and F. Thane DeWeese, Defendants
Personal Injury – Plaintiff
Warren K. Hopkins, Murray KY
Commonwealth of Kentucky, McCracken Circuit Court
November 2010

Cynthia F. Bearden and Michael Bearden, Plaintiffs, v. Gregory B., Lanford, M.D., Neurological Surgeons, PC, and Baptist North Tower Surgical Hospital, Defendants
Medical Malpractice – Plaintiff
Bednarz & Bednarz, Nashville TN
Fifth Circuit Court of Davidson County Tennessee at Nashville
November 2010

Katrina Pare´ Smith, individually and as surviving spouse representing the Estate of Jonathan Pare´ Smith, Plaintiff, v. Mercy Health Partners, Inc., d/b/a St. Mary's Medical Center, Inc., and Andrew Clark, LPN, Defendants
Wrongful Death – Plaintiff
Kelly, Kelly & Allman, Hendersonville TN
Circuit Court for Knox County, Tennessee
November 2010

Richard Whiteshield, Decedent, by and through his children and next of kin, Eric S. Whiteshield, Amy M. Whiteshield, and Melissa Lynn Whiteshield, v. Joe C. Baker, et al., and John Durling (Daryl) Kemper, v. David Boatman, et al.
Wrongful Death – Plaintiff
Rob McKinney, Nashville TN
Davidson County Circuit Court
November 2010

2011

**Amanda Leigh Cagle, By and through her Conservator and Father, Roger Cagle, Plaintiff,
vs. Pamela Denise Murray, M.D.; West Tennessee Healthcare, Inc.; Jackson-Madison
County General Hospital District; Emergency Medical Care Facilities, P.C.; and Donald C.
Correll, M.D.; Defendants
Medical Malpractice – Plaintiff
C. Michael Lawson, Nashville TN
Circuit Court of Madison County, Tennessee
January 2011**

**Austin Lorange, a minor, by his next friends and parents, Tabettha Lorange and Marshall
Lorange, et al., v. Edward D. Eastham, M.D., et al.
Medical Malpractice – Plaintiff
Leader, Bulso & Nolan, PLC, Nashville TN
Rutherford County Circuit Court
January 2011**

**Shelly Elliott & Brandi Cummins, Plaintiff(s), v. United Parcel Service, Inc. and Michael A.
Harrison, Defendant(s)
Personal Injury – Defense
Stockard Robert Hickey, III, Gwin, Steinmetz & Baird, PLLC, Louisville KY
United States District Court, Eastern District of Kentucky Northern Division, Covington
February 2011**

**Mary Gunby and John Gunby vs. J.P. Steele (Jaroslav P. Stulc), M.D. and J.P. Stulc, P.S.C.
Personal Injury – Plaintiff
Charles S. Wible Law Offices, P.S.C., Owensboro KY
Hopkins Circuit Court
February 2011**

**Misleni D. Eastman, Individually and as Co-Administrator of the Estate of Jonathan A.
Eastman, et al., v. Michael R. Pope and Crete Carrier Corporation
Wrongful Death – Plaintiff
Tim L. Bowden, Hendersonville TN
United States District Court for the Middle District of Tennessee at Nashville
March 2011**

**Tonia Freeman v. Becker Law Office
Legal Malpractice – Plaintiff
Kenyon Meyer, Dinsmore & Shohl, LLP, Louisville KY
Jefferson Circuit Court
May 2011**

**John McNatt and Lisa M. Scates, as Administrators of the Estate of Sara McNatt, Plaintiff,
v. Dr. Stephen Shiffman, Defendant
Medical Malpractice – Plaintiff
Karen M. Campbell, Apperson Crump, PLC, Memphis TN
Shelby County Circuit Court
June 2011**

**Ilyas A. Handuleh
Wrongful Death – Plaintiff
Tim L. Bowden, Goodlettsville TN
Circuit Court of Davidson County
July 2011**

**Joni Nix, as wife and next of kin of William Nix, deceased, v. Bruce Hollinger, M.D.;
J. Jeremy Burns M.D.; and Nashville Medical Group, P.C.
Wrongful Death – Plaintiff
Leader, Bulso & Nolan, PLC, Nashville TN
Circuit Court for Davidson County
July 2011**

**Janice Sanderson and Billy J. Sanderson v. Urology Group of Paducah, PSC,
Donald L. Spicer, M.D.
Medical Malpractice – Plaintiff
Kenneth R. Haggard, Hopkinsville KY
McCracken Circuit Court
July 2011**

**Joshua McCluskey
Wrongful Death – Plaintiff
John Lowery & Associates, Nashville TN
Giles County Circuit Court
July 2011**

**Mandy Lane, Administratrix of the Estate of Kirstie Jo Turner, deceased, and Victoria
Turner v. Dr. John W. Brazzell; Mercy Health Partners–Lourdes, Inc. and/or Lourdes
Hospital, Inc.; Jackson Purchase E.R. Physicians, P.S.C.; Brian T. Hawkins; Baptist
Healthcare System, Inc.; and Bluegrass Emergency Medicine Associates, PLLC
Medical Malpractice – Plaintiff
Edwards & Kautz, Paducah KY
August 2011**

**Jacqueline Fisher, For the Estate of Natasha Darna Williams, Deceased, Plaintiff, v.
Arnulfo Agbunag, M.D., Defendant
Medical Malpractice – Plaintiff
Kelly, Kelly & Allman, Hendersonville TN
Fifth Circuit Court of Davidson County, Tennessee
August 2011**

**Kimberly Curtis, Executor of Estate of Charles Curtis, Jr., et al., v. Hohlbein, et al.
Wrongful Death – Plaintiff
Apperson Crump, PLC, Memphis TN
U.S. District Court for the Western District of Kentucky at Paducah
August 2011**

**Jack Dallosta v. Baptist Memorial Hospital, et al.
Medical Malpractice – Plaintiff
Apperson, Crump & Maxwell, PLC, Memphis TN
Shelby County Circuit Court
August 2011**

**D. Wayne Lewis, as surviving spouse of Virginia Lee Lewis, Deceased, Plaintiffs, vs.
Jackson, Tennessee Hospital Company, LLC d/b/a Regional Hospital of Jackson, Jackson-
Madison County General Hospital District, and Charles Alston, M.D.
Medical Malpractice – Plaintiff
Kelly, Kelly & Allman, Hendersonville TN and Art D. Wells & Associations, P.C., Jackson
TN
In the Circuit Court of Madison County, Tennessee at Jackson
September 2011**

**Jerelle Gray, Jerome Gray and Garnetta Gray, Plaintiffs, v. McDonald's Corporation;
Century Management, LLC d/b/a McDonald's, 3363 Austin Peay Highway, Memphis,
Tennessee; Tenth, Inc.; Fred J. Tillman, individually and as managing member of Century
Management, LLC; Chad Tillman, individually and as managing member of Century
Management, LLC; Jackson Martin III
Personal Injury – Plaintiff
Wilks & McHugh, P.A., Memphis TN
In the Western District Court, Western District of Tennessee, Western Division
December 2011**

2012

**Frederick Bertrand vs. The Regional Medical Center at Memphis and Frederick Boop, M.D.
Medical Malpractice – Plaintiff
Bednarz & Bednarz, Nashville TN
Shelby Circuit Court
January 2012**

**John C. F. Schwerin, as Executor of the Estate of Robert L. Schwerin, Jr., Deceased, vs.
Harry Ray Coleman and Katheryn Elizabeth Coleman
Wrongful Death – Plaintiff
Apperson Crump, PLC, Memphis TN
Shelby County Circuit Court
Tennessee Division I
February 2012**

**Estate of Gary Stephen Seaford by and through Administrator, James W. Seaford, v.
Res-Care, Inc., Res-Care, Inc. d/b/a Res-Care Finance, Inc. d/b/a Res Care Home Care,
Louisville, et al.
Wrongful Death – Plaintiff
Donald E. Thomas, Benton KY
Commonwealth of Kentucky, Graves Circuit Court
February 2012**

**Daniel L. Ford
Personal Injury – Plaintiff
Brian & Katz, Paducah KY
United States District Court for the Western District of Kentucky, Paducah Division
February 2012**

**Jessica L. Readen, et al., v. State of Tennessee
Wrongful Death – Plaintiff
Wilkerson, Gauldin, Hayes & Jenkins, Dyersburg TN
In the Claims Commission for the State of Tennessee–Western Division
March 2012**

**Paul Riddle, Sr., Next of Kin to his Son, Paul Riddle, Jr., Deceased, Plaintiff, vs. George W.
Phillips and World Rental Car Sales, Defendant
Wrongful Death – Plaintiff
Apperson Crump, Memphis TN
In the United States District Court for the Western District of Tennessee, Western Division
April 2012**

Blake E. Warren vs. George W. Phillips and World Rental Care Sales, Inc.
Personal Injury – Plaintiff
Apperson Crump, Memphis TN
In the Circuit Court of Shelby County Tennessee for the Thirtieth Judicial District at
Memphis
April 2012

Paule v. Hughes and Genesis Genetics
Wrongful Birth – Plaintiff
Apperson Crump, Memphis TN
Shelby Circuit Court
May 2012

Heather Alumbaugh, as natural mother and next friend of Alicia Lei Alumbaugh, sole heir
at law of decedent, Timothy Patrick Alumbaugh, II, vs. Wackenhut Corporation and Pilot
Travel Centers, LLC
Wrongful Death – Plaintiff
Cohen, Foster & Romine, P.A., Tampa FL
In the Circuit Court of the State of Tennessee, Twentieth Judicial District, Davidson
County
May 2012

Delorne MarKeith Guiden, Plaintiff, v. Leatt Corporation, Defendant
Personal Injury – Plaintiff
Whitlow, Roberts, Houston, Straub, PLLC, Paducah KY
United States District Court, Western District of Kentucky, Paducah Division
July 2012

Kenneth Redd, Plaintiff, v. Vulcan Material Company, Defendant
Personal Injury – Plaintiff
Paxton Law Office, Princeton KY
United States District Court, Western District of Kentucky, Paducah, Kentucky
July 2012

Bradley McLain and Nicole McLain, his wife, vs. Henry L. Utley and McLeod Express,
LLC
Personal Injury – Plaintiff
Burman Law, Hopkinsville KY
Christian Circuit Court
July 2012

Ronald C. Daly, as surviving spouse of Stacey Lynn Helenihi-Daly, deceased, v. William Steely, M.D., et al.

Wrongful Death – Plaintiff

Kelly, Kelly & Allman, Hendersonville TN

Montgomery County Circuit Court

July 2012

Melissa Svendsen v. Wal-Mart

Personal Injury – Plaintiff

Belt Law Firm, Birmingham AL

U.S. District Court, Middle District of Tennessee

August 2012

William v. Tuley v. CSX Transportation, Inc.

Personal Injury – Plaintiff

The Moody Law Firm, Portsmouth VA

Circuit Court of Jefferson County, Kentucky

August 2012

Mary Gortney, surviving spouse of Charles Kenneth Gortney, Plaintiff, vs. Bryan Joseph Kozinski, M.D., Defendant

Personal Injury – Plaintiff

C. Michael Lawson, Nashville TN

In the Circuit Court of Rutherford County, Tennessee

October 2012

Carla Bumgardner, Individually and as Administrator of the Estate of Royce Jhon Bumgardner, v. Earl Paddock Transportation Company, Inc.; Jeffrey A. Whiteside; Marshall A Randall; Deanna R. Mock; and Unknown Driver

Wrongful Death – Plaintiff

Dinsmore & Shohl, LLP, Louisville KY

Jefferson Circuit Court, Division of Honorable Charles L. Cunningham, Jr.

December 2012

2013

Larry Brian Bronson Smith, Administrator Ad Litem of the Estate of Judy Ann Smith, Plaintiff, vs. S.P. Acquisition Corp., a for profit Tennessee Corporation doing business under the assumed name of Grandview Medical Center, Karrie Barnett, R.N., and Rory Justo, M.D., Defendants
Medical Malpractice – Plaintiff
Weill & Long, PLLC, Chattanooga TN
In the Twelfth Judicial District of Tennessee Circuit Court for Marion County
January 2013

Melissa Csaja, by and through her Personal Representative and Executrix, Debra Belcher, vs. Danny Fackler, et al.
Wrongful Death – Plaintiff
McCoy & Sparks, PLLC
Bardstown KY
March 2013

Jody Mitchell Rogers, By his mother and next friend, Laura Tellis, and Laura Tellis, Individually, Plaintiff, v. Michael Lynn Crouch, Administrator of the Estate of Austin Glenn Crouch, deceased, Michael Lynn Crouch, Individually, Marlean Crouch, Individually, Billy Mitchell and Cole Lumber Co., Inc., Defendants
Wrongful Death – Plaintiff
William F. McGee, Jr., Smithland KY
Commonwealth of Kentucky, Livingston Circuit Court
April 2013

Anthony Lewis Dowell and Jacqueline Elaine Dowell, Plaintiffs, v. Michael David Roberson, Individually and as employee/agent of Jones Telecommunications, Inc.; and Jones Telecommunications, Defendants
Personal Injury – Plaintiff
Clore Law Group, LLC, Charleston SC
Houston County Circuit Court
April 2013

Joseph Herman Nalley vs. Auslander Properties, LLC, Steve Auslander and DX 2go, LLC
Personal Injury – Plaintiff
McCoy & Sparks, PLLC, Bardstown KY
Commonwealth of Kentucky, Nelson Circuit Court
April 2013

Lucille A. Fenner, individually and as surviving spouse of William Fenner, Jr., deceased, Plaintiff, v. Robert H. Gillespie and Dickson Carnival Company, Defendants
Wrongful Death – Plaintiff
Bass Berry & Sims, PLC, Nashville TN
In the Circuit Court for the State of Tennessee, Nineteenth Judicial District at Montgomery County
June 2013

Nancy Mattern, Individually, and as Wife and Next Friend of Fritz Mattern, Deceased, v. Gilreath & Associates, Robert Christopher Gilreath and Sidney W. Gilreath
Wrongful Death – Plaintiff
Apperson Crump, PLC, Memphis TN
In the Circuit Court for Shelby County Tennessee for the Thirtieth District at Memphis
July 2013

Dax R. Womack v. Matt Conley, Kentucky State Police, et al.
Wrongful Arrest – Plaintiff
Travis B. Lock, Bowling Green KY
United States District Court, Western District of Kentucky at Owensboro
July 2013

Alex B. Gates, Bankruptcy for the Estate of John E. Jackson and Katrina L. Jackson, and John E. Jackson, Plaintiffs, v. Jerry D. Benitone, M.D. and J.D. Benitone, M.D., P.C., Defendants
Medical Malpractice – Plaintiff
Apperson Crump, PLC, Memphis TN
In the Circuit Court of Tennessee for the Thirtieth Judicial District at Memphis
July 2013

David Cherry, Personal Representative of the Estate of Pamela Cherry, deceased, vs. Macon Hospital, Inc., d/b/a Macon County General Hospital and Hanna C. Ilia, M.D.
Wrongful Death – Plaintiff
Wilson, Kehoe & Winingham, LLC, Indianapolis IN
United States District Court for the Middle District of Tennessee, Northeast Division
August 2013

Gary J. Hodges and Porta Hodges, Plaintiffs, vs. G&IV Dogwood Creek, LLC, and Fogelman Management Group, LLC, Defendants
Personal Injury – Plaintiff
Apperson Crump, PLC, Memphis TN
In the Circuit Court of Tennessee for the Thirtieth Judicial District at Memphis
October 2013

**Carol D. Raiford, by and through William Raiford, as Power of Attorney, Plaintiff, vs.
James G. Porterfield, M.D., and Arrhythmia Consultants, P.C., Defendants
Personal Injury – Plaintiff
Apperson Crump, PLC, Memphis TN
In the Circuit Court of Tennessee for the Thirtieth Judicial District at Memphis
November 2013**

**David Pratt, Individually, and as Surviving Spouse and Administrator of Estate of Connie
Jo Pratt, Deceased, Plaintiff, vs. David Lan, M.D., Memphis Heart Clinic, Baptist
Memorial Hospital, Baptist Memorial Healthcare Corporation, The West Clinic d/b/a
Memphis Health Clinic, Defendants
Wrongful Death – Plaintiff
Apperson Crump, PLC, Memphis TN
In the Circuit Court of Tennessee for the Thirtieth Judicial District at Memphis
December 2013**

CASES IN WHICH TESTIMONY WAS GIVEN DURING TRIAL
Gilbert L. Mathis

2009

Wanda Hobbs and Raleigh Hobbs v. Robert P. Meriwether, M.D.; Sean P. McDonald, M.D.; and Neurosurgical Associates of Western Kentucky, P.C.
Personal Injury – Plaintiff
Conway & Keown, Hartford KY
April 2009

Paula Osborne and Carolyn McNeill v. Gerald Pinsonneault and Sitton Motor Lines, Inc.
Personal Injury – Plaintiff
Saladino, Oakes & Schaaf, Paducah KY
U.S. District Court, Western District of Kentucky, Owensboro Division
April 2009

Bud Lee, et al., v. Metropolitan Government of Nashville/Davidson County, Tennessee, et al.
Wrongful Death – Plaintiff
Bednarz & Bednarz, Nashville TN
United States District Court of Tennessee, Middle District at Nashville
April 2009

Karen A. Lilly, Individually and as surviving spouse of Charles E. Lilly, Jr., and as parent of and for the benefit of Aaron Lilly and Andrew Lilly, Plaintiffs, vs. Estate of Billy Marvin Walker, Kelly Renee Brooks as Executrix, and Billy Walker Enterprises, Defendants
Wrongful Death – Plaintiff
Jeffrey R. Kohl, Nashville TN
Circuit Court of Sumner County TN
April 2009

Kelly Renee Brooks as Executrix and Billy Walker Enterprises, Defendants
Wrongful Death – Plaintiff
Jeffrey R. Kohl, Nashville TN
Circuit Court of Sumner County, Tennessee
April 2009

James and Patricia Cullum, Natural Parents of Samuel Cullum, a Minor, Plaintiffs, vs. Susan E. Mackey, M.D.; Women's Health Alliance, P.C.; Baptist Hospital System, Inc.; and Baptist Women's Health Center, L.L.C.; Defendants
Personal Injury – Plaintiff
Bednarz & Bednarz, Nashville TN
Sixth Circuit Court for Davidson County TN
June 2009

Yvette Daniels v. Paul E. Disney
Personal Injury – Plaintiff
John M. Longmeyer, P.S.C., Louisville KY
Jefferson Circuit Court
July 2009

Jennifer Darlene Bunch and husband, Robert Bunch, vs. Jeffrey Landman, M.D. and
Virtual Radiology, P.C.
Personal Injury – Plaintiff
Barry E. Weathers, Nashville TN
Davidson Circuit Court
September 2009

Dawn D. Rideout vs. Michael H. Howard, M.D., et al.
Personal Injury – Plaintiff
Conway & Keown, Hartford Ky
U.S. District Court for the Western District of Kentucky at Owensboro
September 2009

Yongfin Min, et al., Plaintiffs, vs. State of Tennessee, Defendant
Wrongful Death – Plaintiff
Rob McKinney, Nashville TN
In the Claims Commission for the State of Tennessee, Middle Division
November 2009

Chera Lynn Warren, Individually, and as Personal Representative of Perry Dwain
Warren, and mother and next friend of Tanner Reagan Perry Warren, vs. Kenneth H.
Jones
Wrongful Death – Plaintiff
Hargrove & Foster, Mayfield KY
Carlisle County Circuit Court
December 2009

2010

Oscar Turner, Jr., et al., Plaintiff, vs. Branch Banking & Trust, Defendant
Bank Loan Resolution – Plaintiff
Null, Samson & Paitzel, Mayfield KY
Commonwealth of Kentucky, Calloway Circuit Court
February 2010

Andrea R. Payne, Individually, and Andrea R. Payne, next friend and Natural Guardian of Gracie Jo Johnson (a/k/a Payne), an infant, vs. Donald E. Wink and Marvin L. Wink, d/b/a Wink Brothers Farms
Personal Injury – Plaintiff
Charles S. Wible, Owensboro KY
Daviess Circuit Court
March 2010

Lorrie Eicher, representative for Robert Lambert, Jr., deceased, Plaintiff, vs. Humphreys County Sheriff Ronnie Tounette, et al., Defendants
Wrongful Death – Plaintiff
David B. Lyons, Nashville TN
In the Circuit Court for Humphreys County, Tennessee at Waverly
July 2010

Brenda Jo Williams, Darwin Williams, Plaintiffs, vs. Dana R. Tyrrell, Western Baptist Hospital and F. Thane DeWeese, Defendants
Personal Injury – Plaintiff
Warren K. Hopkins, Murray KY
Commonwealth of Kentucky, McCracken Circuit Court
November 2010

2011

Cynthia F. Bearden and Michael Bearden, Plaintiffs, v. Gregory B. Lanford, M.D., Neurological Surgeons, PC, and Baptist North Tower Surgical Hospital, Defendants
Personal Injury – Plaintiff
Bednarz & Bednarz, Nashville TN
Fifth Circuit Court of Davidson County, Tennessee at Nashville
January 2011

Katrina Pare' Smith, individually as Surviving Spouse Representing the Estate of Jonathan Paul Smith, and as Parent and Next Friend of Carrie Ann Smith, a Minor, Plaintiff, vs. St. Mary's Health System Inc. d/b/a St Mary's Medical Center, Inc., James Joseph Kennedy, M.D., and Andrew J. Clark
Medical Malpractice – Plaintiff
Kelly, Kelly & Allman, Hendersonville TN
Circuit Court for Knox County, Tennessee
February 2011

Mary Gunby and John Gunby vs. J.P. Stulc (Jaroslav P. Stulc), M.D. and J.P. Stulc, P.S.C.
Personal Injury – Plaintiff
Charles S. Wible Law Offices, P.S.C., Owensboro KY
Hopkins Circuit Court
April 2011

Janice Sanderson and Billy J. Sanderson v. Urology Group of Paducah, PSC, Donald L. Spicer, M.D.

Medical Malpractice – Plaintiff

Kenneth R. Haggard, Hopkinsville KY

McCracken Circuit Court

August 2011

Austin T. Wells, a Disabled Person, by and through his Conservator and Natural Mother, Carron C. Wells Baker, v. Donald Estes, Estes LLC and the State of Tennessee

Personal Injury – Plaintiff

Apperson Crump & Maxwell, PLC

Memphis TN

Shelby Circuit Court

October 2011

D. Wayne Lewis as surviving spouse of Virginia Lee Lewis, Deceased, vs. Jackson, Tennessee Hospital Company, LLC d/b/a Regional Hospital of Jackson, Jackson-Madison County General Hospital District, and Charles Alston, M.D.

Medical Malpractice – Plaintiff

Kelly, Kelly and Allman, Hendersonville TN

Madison County Circuit Court

October 2011

Joni Nix, as wife and next of kin of William Nix, deceased, vs. Bruce Hollinger, M.D., J. Jeremy Burns, M.D. and Nashville Medical Group, P.C.

Wrongful Death – Plaintiff

Leader, Bulso, & Nolan, PLC, Nashville TN

Circuit Court for Davidson County

November 2011

2012

Ann Disch, wife and next of kin of Robert Disch, deceased, v. Carl Hampf, M.D., et al.

Medical Malpractice – Plaintiff

Leader, Bulso & Nolan, PLC, Nashville TN

Circuit Court of Davidson County

January 2012

Jennifer Duncan, Deanna Knight, Kathy Crowe and Brandy Fowler, Claimants, v. Daymar Colleges Group, LLC, Daymar Learning of Paducah, Inc., et al.

Education Claim – Plaintiff

Bryant Law Center, P.S.C., Paducah KY

American Arbitration Association

January 2012

Tonia Freeman v. Becker Law Office, PLLC, et al.
Legal Malpractice – Plaintiff
Dinsmore & Shohl, LLP, Louisville KY
Jefferson Circuit Court
February 2012

Joshua McCluskey
Wrongful Death – Plaintiff
John Lowery & Associates, Nashville TN
Giles County Circuit Court
February 2012

William Michael Ray and Sandra Ray, Plaintiffs, v. Columbia/HCA Healthcare Corporation/Hospital Corporation of America, Emerald-Hodgson Hospital, Southern Tennessee Medical Center, LLC, and Asher A. Turney, M.D., Defendants
Medical Malpractice – Plaintiff
Higgins, Himmelberg & Piliponis, PLLC, Nashville TN
In the Circuit Court of Franklin County, Tennessee
February 2012

Jessica L. Readen, et al., v. State of Tennessee
Wrongful Death – Plaintiff
Wilkerson, Gauldin, Hayes & Jenkins, Dyersburg TN
In the Claims Commission for the State of Tennessee – Western Division
April 2012

Cynthia F. Bearden and Michael Bearden, Plaintiffs, v. Gregory B. Langford, M.D., Neurological Surgeons, P.C., and Baptist North Tower Surgical Hospital, Defendants
Medical Malpractice – Plaintiff
Bednarz & Bednarz, Nashville TN
Fifth Circuit Court of Davidson County Tennessee at Nashville
April 2012

Burks vs. Burks
Divorce – Defense
Wilkerson, Gaulden, Hayes & Jenkins, Dyersburg TN
Dyer Circuit Court
May 2012

Paule v. Hughes and Genesis Genetics
Wrongful Birth – Plaintiff
Apperson Crump, Memphis TN
Shelby Circuit Court
June 2012

**James and Patricia Cullum, Natural Parents of Samuel Cullum, a Minor, Plaintiffs, vs.
Susan E. Mackey, M.D., Women's Health Alliance, P.C., Baptist Hospital System, Inc., and
Baptist Women's Health Center, LLC, Defendants
Personal Injury – Plaintiff
Bednarz & Bednarz, Nashville TN
Davidson County Circuit Court
July 2012**

**Cynthia Green and Lee Ray Green, husband and wife, Plaintiffs, vs. Samella Spence, et al.,
Defendants
Personal Injury – Plaintiff
Lucius Hawes Law Firm, Hopkinsville KY
Davidson Circuit Court
August 2012**

**William v. Tuley v. CSX Transportation, Inc.
Personal Injury – Plaintiff
The Moody Law Firm, Portsmouth VA
Circuit Court of Jefferson County, Kentucky
October 2012**

2013

Chad Everett and Stephanie Everett, Plaintiffs, and Kentucky Farm Bureau Mutual Insurance Company v. Chrysler Group, LLC (f/k/a New Carco Acquisitions, LLC), Defendant

Post Judgment Interest – Defendant

Boehl Stopher & Graves, LLP, Paducah KY

Commonwealth of Kentucky, Fulton Circuit Court

January 2013

Bradley McLain and Nicole McLain, his wife, vs. Henry L. Utley and McLeod Express, LLC

Personal Injury – Plaintiff

Burman Law, Hopkinsville KY

Christian Circuit Court

February 2013

Michelle Morris vs. Paul R. McCombs, M.D. and the Center for Spinal Surgery, LLC

Medical Malpractice – Plaintiff

Kelly, Kelly & Allman, Hendersonville TN

Davidson Circuit Court

March 2013

Frederick Bertrand vs. The Regional Medical Center at Memphis and Frederick Boop, M.D.

Medical Malpractice– Plaintiff

Bednarz & Bednarz, Nashville TN

Shelby County Circuit Court

April 2013

Melissa Svendsen v. Wal-Mart

Personal Injury – Plaintiff

Belt Law Firm, Birmingham AL

U.S. District Court, Middle District of Tennessee

May 2013

Jody Michel Rogers, By his Mother and next friend, Laura Tellis and Laura Tellis, Individually, Plaintiffs, v. Michael Lynn Crouch, Administrator of the Estate of Austin Glenn Crouch, deceased, et al., Defendants

Wrongful Death – Plaintiff

William F. McGee, Jr., and Cobie D. Evans, Smithland KY

Commonwealth of Kentucky, Livingston Circuit Court

June 2013

Joseph Herman Nalley vs. Auslander Properties, LLC, Steve Auslander and Dx2go, LLC
Personal Injury – Plaintiff
McCoy & Sparks, PLLC, Bardstown KY
Nelson Circuit Court
September 2013

Lucille A. Fenner, individually, and as surviving spouse of William Fenner, Jr., deceased,
Plaintiff, v. Robert H. Gillespie and Dickson Carnival Company, Defendants
Wrongful Death – Plaintiff
Bass Berry & Sims, PLC, Nashville TN
In the Circuit Court for the State of Tennessee, Nineteenth Judicial District at Montgomery
County
October 2013

Ronald C. Daly as Surviving Spouse of Stacey Lynn Helenihi-Daly, deceased, v. William
Steely, M.D., et al.
Wrongful Death – Plaintiff
The Kelly Firm, Hendersonville TN
Montgomery Circuit Court
November 2013

CASES IN WHICH TESTIMONY WAS GIVEN THROUGH DEPOSITION
Gilbert L. Mathis

2014

**Cindy P. McCroskey, on Behalf of herself and all wrongful Death Beneficiaries of Jerry
Dennis McCroskey, Deceased, v. Bruce Todd Thompson, M.D., and Physicians Care, P.C.
Wrongful Death – Plaintiff**

Jon C. Peeler

Nashville, Tennessee

In the Circuit Court of Hamilton County TN

February 2014

**Vaal Hall, by and through his conservator, Theresa Ann Hall and Theresa Ann Hall,
Individually, v. Charles L. Owens, Jr.; Pepsico, d/b/a/ Pepsi Company; Pepsi Americas;
Delta Beverage Group, Inc., Pepsi-Cola Bottling Company**

Personal Injury – Plaintiff

Williamson, Webster, Falb & Glisson

Alton, Illinois

Madison County, TN Circuit Court

February 2014

Steven D. Beard, Plaintiff, vs. Illinois Central Railroad Company, d/b/a/ CN, Defendant

Personal Injury – Plaintiff

Callis, Papa, Hale & Szewczyk, PC

Granite City, Illinois

In the Circuit Court of Tennessee for the Thirtieth Judicial District at Memphis

April 2014

**Junamon Atchison, Individually, Age 18, and Lesa George as the Natural Mother and next
friend of Junamon Atchison, and Lesa George as the caregiver of Junamon Atchison,
Plaintiffs vs. Scott Graham, M.D., Family Practice Care, LLC, et al Defendants**

Personal Injury – Plaintiff

Wendell Holloway

Madisonville, KY

Commonwealth of Kentucky, Crittenden Circuit Court, Marion, KY

April 2014

Eddie Franklin vs. Kentucky Farm Bureau Mutual Insurance Company

Personal Injury – Plaintiff

Edwards and Kautz

Paducah, KY

Commonwealth of Kentucky, Graves Circuit Court

June, 2014

D-1

Christina T. McDonald, individually and as Administratrix of the Estate of Alexis V. Thompson (deceased) v. Sumner County Board of Education, et al.
Wrongful Death – Plaintiff
Tim L. Bowden
Goodlettsville, TN
Sumner County Circuit Court, Gallatin, TN
June 2014

Christopher Shawver and Michelle Shawver, Plaintiffs, vs. Bombardier Recreational Products, Inc. BPRUS, Inc., and Kentucky Power Sports, Inc. d/b/a/ Yamaha of Millington, Defendants
Personal Injury – Plaintiffs
Bolus Law Offices
Louisville, KY
Trigg Circuit Court
August 2014

John D. McCrum and Elizabeth McCrum, Plaintiffs v. Alexander Mathew, M.D. and UT Medical Group, Inc.; Defendants
Personal Injury – Plaintiffs
Glassman, Wyatt, Tuttle & Cox, PC
Lauren Stimac, Esq.
Memphis, TN
In the Circuit Court of Shelby County Tennessee for the Thirtieth Judicial District at Memphis
October 2013

John Weyers, Jr. and Dorothea Weyers v. Davis Pharmacy, d/b/a/ Reidland Phaymacy, Glen R. Van Loon and Ann Matejcek, a PRN
Personal Injury – Plaintiff
Morris & Player, PLLC
Louisville, KY
Marshall Circuit Court
November 2014

2015

Epilito Guevara, et al., v Pamela Carr, et al
Wrongful Death, Plaintiff
Apperson Crump
Memphis Tennessee
United States District Court, Western District of Tennessee
February 2015

Harry W. Dillon and Elizabeth Dillon v. Roy Matlock
Personal Injury – Plaintiff
Rocky McElhaney Law Firm, PC
Nashville, Tennessee
First Circuit Court of Davidson County Tennessee
May 2015

Timothy R. Futrell vs. The Travelers Casualty Insurance Company of America
Business Loss – Plaintiff
Lucius Hawes Law Firm
Hopkinsville, Kentucky
United States District Court, Western District of Kentucky, Paducah Division
May 2015

Chayce Collier, a minor, by and through his natural parent and next friend Kendall Collier, Plaintiff vs. Pericilis Roussis, M.D., Fort Sanders Perinatal Center and Fort Sanders Regional Medical Center
Personal Injury – Plaintiff
Bednarz and Bednarz
Hendersonville, Tennessee
Circuit Court for Knox County Tennessee at Knoxville
May 2015

Randle D. Arnold, Jr., and his spouse Ernestine Arnold, Plaintiffs, vs. Fedex Ground Package System, Inc., and Rodney Johnson, Defendants
Personal Injury – Plaintiff
The Law Office of Libby & Nahmias
Memphis, Tennessee
Circuit Court of Tennessee for the Thirtieth Judicial District at Memphis
June 2015

D-3

**Carolyn Y. Dozier, Administrator ad litem of the Estate of Santay Laressa Dozier, Plaintiff,
vs. Parkridge Medical Center, Inc., a for-profit Tennessee Corporation doing business as
Parkridge Medical Center. David C. Redd, M.D. individually and David C. Redd, M.D.,
P.C., a Tennessee Corporation, Defendants**

Wrongful Death – Plaintiff

Weil & Long

Chattanooga, Tennessee

Circuit Court of Hamilton County Tennessee

June 2015

**Terry Chambers, Plaintiff v. Kohler Co., Troy Built, LLC and Lowes' Home Center, Inc.
Defendants**

Personal Injury – Plaintiff

The Button Law Firm

Lewisville, Texas

In the United States District Court for the Northern District of Texas, Dallas Division

July 2015

Alice Ball Breuer v. Andrew Barnes

Personal Injury – Plaintiff

Hughes & Coleman, PLLC

Nashville, Tennessee

Circuit Court of Williamson County Tennessee at Franklin

August 2015

**Kennedy William Miller, Plaintiff, vs. Chinenye Uchendu, M.D. Methodist Healthcare
Memphis Hospitals d/b/a/ Methodist Lebonheur Healthcare and Methodist Healthcare
Foundation, Defendants**

Personal Injury – Plaintiff

Apperson Crump

Memphis, Tennessee

In the United States District Court for the Western District of Tennessee Western Division

December 2015

2016

**Lewis E. Crayton, deceased, b/n/f James Crayton, Sr., his father and next of kin, Plaintiffs
v. Angelica Textile Services, Inc. Penske Truck Leasing Co. L. P. and Kenton Jerome
Smith, Defendants**

Wrongful Death – Plaintiff

Bart Durham Injury Law

Nashville, Tennessee

In the Circuit Court of Carroll County, Tennessee

February 2016

D-4

Jordan Franklin – Mansuo, Individually, and as Administrator of the Estate of Suzie Franklin v. AMISUB (SFH), Inc. d/b/a Saint Francis Hospital, et al
Wrongful Death – Plaintiff
Apperson Crump, PLC
Memphis, Tennessee
Circuit Court for Shelby County, Division V
February 2016

Kristy Lee Cox, Personal Representative of the Estate of Richard L. Cox, Deceased v. Rogers Group, Inc.; et al
Wrongful Death – Plaintiff
Rhoads and Rhodes, P. S. C.
Owensboro, Kentucky
Commonwealth of Kentucky, Henderson Circuit Court
March 2016

Stephen McCarty vs City of Southside Place, Texas, USERRA Suite,
Wrongful Termination – Plaintiff
Joseph A Napiltonia
Franklin, Tennessee and Lapin & Landa, L.L. P.
Houston, Texas
U.S. District Court, Houston, Texas
April 2016

Jane R. Wray, New England Compounding Pharmacy, Inc., Product Liability
Litigation
Personal Injury – Plaintiff
Lieff, Cabraser, Heimann & Bernstein, L.L.P.
Nashville, Tennessee
United States District Court for the District of Massachusetts
May 2016

Natasha Francis, Individually and as Administrator of the Estate of Loman Owen, IV Deceased, et al. vs. CSX Transportation, Inc., et al
Wrongful Death – Plaintiff
Nancy E. S. Calloway
Elkton, Kentucky
Commonwealth of Kentucky
Christian Circuit Court
June 2016

**Raymond Murby, Jr., Plaintiff, vs. General Electric Healthcare, Inc.
Alliance Imaging, Inc., and Methodist Healthcare-Fayette, Defendants
Personal Injury, Plaintiffs
Law Office of Jeffrey A. Garrety
Jackson, Tennessee
In the Circuit Court of Fayette County, Tennessee for the
Twenty-Fifth District at Somerville
September 2016**

**William Webb vs. Crounse Corporation
Personal Injury – Plaintiff
Lawrence “Larry” N. Curtis
Lafayette, LA
U.S. District Court, Western District of Kentucky
October 2016**

**Robin Williamson, as mother and next of kin of decedent Joseph Garcia v.
Kevin Davenport, Nationwide OTR Recyclers, Inc. and Metropolitan
Government of Nashville and Davidson County, Tennessee
Wrongful Death – Plaintiff
Michael D. Ponce
Goodlettsville, TN
United States District Court for the Middle District
of Tennessee at Nashville
October 2016**

**Gough Farms, LLC, Plaintiff vs. Countrymark Energy Resources, LLC
Property Damages – Plaintiff
Stephen M. Arnett
Morganfield Kentucky
United States District Court
Western District of Kentucky
Owensboro, Kentucky
November 2016**

**Jill Payne Foster, Individually and as Administrator of the Estate of
Brian Daryl Foster Deceased, Plaintiff vs. Autumn Loomis, M.D.;
James Coomes, M.D.; CEP America-Kentucky, LLP; CEP America LLC;
and Owensboro Health, Inc. Defendants
Personal Injury – Plaintiff
Foreman, Watson, Holtrey, LLP
Owensboro, KY
Commonwealth of Kentucky
Daviess Circuit Court
December 2016**

2017

**Jessica A. Harris and Ricky L. Harris, as Administrator of the Estate of
Ricky Harris, III, Individually, and Ricky L. Harris, Individually, Plaintiffs,
vs. Transylvania University, Nicholas P. Conway, Morgan T. Cyrus and
Carolyn Owens, Defendants
Wrongful Death – Defense
Landrum & Shouse, LLP
Lexington KY
Commonwealth of Kentucky
Fayette Circuit Court Fourth Division
January 2017**

**Freddie Sutton v. Housing Authority of Hickman, Kentucky a/k/a/ The
Municipal Planning Commission v. Darrell Davis Roofing Co., Inc.
Personal Injury – Plaintiff
Law Office of Brian S. Katz
Paducah, Kentucky
United States District Court
Western District of Kentucky
Paducah Division
February 2017**

**David Jernigan, as Next of Kin and Surviving Husband to Jane Ann Jernigan,
Deceased, Plaintiff vs. Robert Evan Paasche, M.D., Cumberland Medical Center, Inc.,
James F. Wojcik, M.D. and Emergency Coverage Corporation, Defendants
Wrongful Death – Plaintiff
Bednarz & Bednarz
Hendersonville, Tennessee
In the Circuit Court for Putnam County, Tennessee
June 2017**

**Briton Gage Blackburn, a minor, individually, and as the Natural child of Cody Charles
Blackburn, deceased, By Next Friend and Grandfather, Barry Charles Blackburn
Plaintiffs, v. Mark A. McLean, M.D., Stephen Caleb Barr, M.D., and Maury Regional
Hospital, d/b/a/ Maury Regional Medical Center, Defendants
Wrongful Death - Plaintiff
Bednarz & Bednarz
Hendersonville, TN
Maury County Tennessee Circuit Court
July 2017**

D-7

Laura Michele Harper, et al. Plaintiff vs. Davies County, Kentucky, et al. Defendants
Wrongful Death - Plaintiff
Brice L. Caldwell
Owensboro, Kentucky
United States District Court, Owensboro Division
August 2017

Taryne Patterson, A Minor, by and through her parents and next friends, Brandi Patterson and Tracy Patterson and Brandi Patterson and Tracy Patterson, individually, Plaintiffs, vs. Cathy A. Deppen, M.D., and Tennessee Women's Care, P.C.
Personal Injury – Plaintiff
Bednarz & Bednarz
Hendersonville, TN
In The First Circuit Court of Davidson County, Tennessee
September 2017

Neetu Sanwal, individually, and as Surviving Spouse of Narinder Sanwal, Deceased, Plaintiff v. Saint Francis Hospital – Bartlett, Inc., Defendant
Wrongful Death – Plaintiff
The Fowler Law Firm, PLLC
Memphis, TN
United States District Court for the Western District of Tennessee
September 2017

CASES IN WHICH TESTIMONY WAS GIVEN DURING TRIAL
Gilbert L. Mathis

2014

Kevin Bloomfield v. Metropolitan Government of Nashville
Personal Injury – Plaintiff
Rocky McElhaney Law Firm
Nashville, TN
The Third District of the Davidson County Circuit Court
January 2014

Jennifer Darlene Bunch and husband, Robert Bunch, vs. Jeffrey Landman, M.D., and
Virtual Radiology, P.C.
Personal Injury – Plaintiff
Law Office of Barry E. Weathers, P.C.
Nashville, TN
Circuit Court of Davidson County, TN
June 2014

Donna Faye Shipley, and Husband Frank Shipley, Plaintiffs v. Robin Williams, M.D.
Defendant
Personal Injury – Plaintiff
Bednarz & Bednarz
Hendersonville TN
Davidson Circuit Court
July 2014

Tiffany Barnes v. Landman, M.D.
Personal Injury – Plaintiff
C. Michael Lawson
Nashville, TN
Davidson Circuit Court, Tennessee
August 2014

Vickie P. Jacobs, Surviving Spouse of Harris N. Jacobs, Defendant, et al. v. Nashville Ear,
Nose & Throat Clinic; Southeast Ear, Nose & Throat Specialists, LLC; et al.
Wrongful Death – Plaintiff
Ashworth & Associates
Davidson Circuit Court
Nashville, TN
August 2014

T-1

2015

**Deborah Peters individually and as surviving spouse of James A. Peters, deceased, Plaintiff
v. Harton Regional Medical Center; Dr. Samad Honarvar; Dr. Joel Birdwell; and Dr.
Kenneth Holbert, Defendants
Wrongful Death – Plaintiff
Kious, Rodgers, Barger, Holder & Kious, PLLC
Murfreesboro, Tennessee
Circuit Court for Coffee County, Tennessee
June 2015**

**Chayce Collier, a minor, by and through his natural parent and next friend Kendall
Collier, Plaintiff, vs, Pericilis Rousser, M.D., Fort Sanders Perinatal Center, and Fort
Sanders Regional Medical Center
Personal Injury – Plaintiff
Bednarz & Bednarz
Hendersonville, Tennessee
Circuit Court for Knox County, Tennessee at Knoxville
July 2015**

2016

**Cheryl Roach and Stephen Philip Roach, II, her husband, Plaintiffs vs. Laura Hughs,
Warner Chilcott, PLC, Warner Chilcott, Sales (U.S.), LLC; and Wheels Lt; Defendants
Personal Injury – Plaintiff
Rhoads & Rhoads, P.S.C.
Owensboro, Kentucky
United States District Court, Western District, Owensboro, Kentucky
April 2016**

**Liliana Longmeyer vs. Mark A. Stallard and Auto Owners Insurance Company
Personal Injury – Plaintiff
Dinsmore & Shohl, LLP
Louisville, Kentucky
Jefferson Circuit Court, Divison 8
April 2016**

2017

Kerry Culberson and Karen Culberson, Individually and as Heirs of Kolton Wayne Culberson, Deceased, plaintiffs, vs. R. B. Transport, Inc. and Terry Lynn Byram, Defendants
Wrongful Death – Plaintiffs
The Button Law Firm
Dallas, Texas
In the District Court 102nd Judicial District, Bowie County, Texas
January 2017

Kennedy William Miller, Plaintiff, v. Chenenye Uchendu, M.D. and Methodist Healthcare Memphis Hospitals d/b/a/ Methodist LeDonheur Healthcare, Defendants
Personal Injury – Plaintiff
Apperson Crump, PLC
Memphis, Tennessee
United States District Court for the Western District of Tennessee
February 2017

Beverly and Keith Knight, Plaintiffs, vs. W. Craig Clark, M.D. Defendant
Personal Injury – Plaintiff
Gary K. Smith Law, PLLC
Memphis, Tennessee
In the Circuit Court of Desoto County, Mississippi
March 2017

CFO Services, Inc., Plaintiff/Counter-Defendant vs. Carol L. Wright and Anthony F. Bianco, Defendants/Counter-Plaintiffs
Colin B. Calhoun
Sobel, Poss & Moore
Nashville, Tennessee
In The Chancery Court For The State Of Tennessee, Twentieth Judicial Dristict, Davidson County, Part IV
August 2017